The Honorable Tiffany M. Cartwright 1 2 3 4 5 6 7 UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF WASHINGTON 8 9 NO. 3:24-cv-05185-TMC SANDRA RITENBURGH STIPULATED MOTION AND 10 Plaintiff, ORDER TO EXTEND DEADLINES FOR FILING MOTION TO JOIN 11 VS. PARTIES AND FOR AMENDING CLARK COUNTY JAIL; CLARK COUNTY 12 **PLEADINGS** SHERIFF'S OFFICE; CLARK COUNTY; NAPHCARE, INC., an Alabama Corporation; 13 NOTE ON MOTION CALENDAR: and JOHN and JANE DOES 1-20, individually September 6, 2024 and in their official capacities acting under the 14 color of state law, 15 Defendants. 16 17 STIPULATED MOTION 18 Pursuant to Local Civil Rules 7(j), 7(d)(1), and 10(g), Plaintiff and all named Defendants 19 in this action, through their respective counsel, hereby submit this stipulated motion to extend 20 deadlines for filing motions to join parties and for amending pleadings, contained in the Court's June 12, 2024 Order Setting Jury Trial and Pretrial Dates (Dkt. # 19) (the "Scheduling Order"). 21 The Scheduling Order currently sets September 9, 2024 as the deadline for filing a motion 22 to join parties and September 23, 2024 as the deadline for amending pleadings in this case. The 23 24 STIPULATED MOTION AND ORDER TO

Northwest Justice Project 1104 Main St., #500 Vancouver, WA 98660 Phone: (360) 693-6130 | Fax: (206) 299-9716 parties request that the Court extend these two deadlines as follows: October 8, 2024 for filing motion to join parties, and October 18, 2024 for amending pleadings.

Good cause exists to extend these deadlines because discovery is ongoing in this case, with responses currently pending from both Plaintiff and Defendant NaphCare, which responses may materially alter the pleadings, and/or may lead to positive identification of "John" and "Jane Doe" defendants, who are believed to be employees the named Defendants but who have yet to be identified. The parties are additionally currently engaged in active settlement discussion, which has resulted in delays to the aforementioned discovery responses. The parties' request is made in good faith and not for the purposes of delay. Additionally, extending these two deadlines would not affect any other deadline in the Scheduling Order, or any other dates or deadlines previously set by the Court.

THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by Plaintiff and all named Defendants, and subject to the Court's approval, that the deadline for filing a motion to join parties be extended to October 8, 2024; and that the deadline for amending pleadings be extended to October 18, 2024.

DATED: September 6, 2024.

/s/ Jordan Taylor, WSBA #46082

Henderson Taylor Law Firm, PLCC
900 Washington Street, Suite 1010

Vancouver, WA 98660
360.37.1478
jordan@hlf-law.com

Attorney for Plaintiff

/s/ Carl G. Snodgrass, WSBA #58454
Northwest Justice Project
1104 Main Street, Suite 500
Vancouver, WA 98660
360.693.6130
carl.snodgrass@nwjustice.org
Attorney for Plaintiff

/s/ Caitlin Skurky, WSBA #60246

Kneupper & Covey PC 17011 Beach Blvd., Suite 900 Huntington Beach, CA 92647 206.759.7520 caitlin@kneuppercovey.com Attorney for Plaintiff

24

1	/s/ Deborah R. Wechselblatt, WSBA #474 /s/ Amanda Migchelbrink, WSBA #34223	
2	Clark County Prosecutor's Office – Civil Division	Fox Ballard PLCC 1325 Fourth Ave Ste 1500
3	PO Box 5000 Vancouver WA 98666-5000	Seattle WA 98101 206.800.2727
4	564.397.2478	jonathan@foxballard.com
5	Deb.wechselblatt@clark.wa.gov Amanda.migchelbrink@clark.wa.gov	ross@foxballard.com Attorneys for Defendants Naphcare
6	Attorneys for Defendant Clark County	
7		
8		
9	<u>ORDER</u>	
10	IT IS SO ORDERED.	
11	Dated this 6th day of September, 2024.	
12		- / / to
13		TIFFANY M. CARTWRIGHT
14		UNITED STATES DISTRICT JUDGE
15	Presented by:	
16	/s/ Carl G. Snodgrass, WSBA #58454	
17	Northwest Justice Project 1104 Main Street, Suite 500	
18	Vancouver, WA 98660 360.693.6130	
19	carl.snodgrass@nwjustice.org Attorney for Plaintiff	
20		
21		
22		
23		
24		